



# JOINT MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 30/06/2024



# DECODE

**Decode Corp Pty Ltd (ACN 629 285 534)  
& Decode Group Pty Limited (ACN 611 188 339)**

Level 8, 52 Alfred St, Milsons Point NSW 2061



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01

ABOUT US





## ABOUT US

This joint modern slavery statement for the year ending 30 June 2024 has been prepared by Decode Corp Pty Ltd (ACN 629 285 534) (**DC**) and Decode Group Pty Limited (ACN 611 188 339) (**DG**), both of which are Australian proprietary companies. The registered office address for both DC and DG is Level 8, 52 Alfred Street, Milsons Point NSW 2061.

The sole director of both DC and DG is Hussein El Rihani. DC and DG are associated entities forming a corporate group operating a construction business trading as '**Decode**'.

Since our founding in 2008, Decode has evolved into a leading tier 2 construction company in residential living NSW. With a diversified portfolio that covers the full spectrum of the construction industry, we are a team of passionate and innovative builders driven by a shared commitment to excellence.

At Decode, "Building Relationships" is the cornerstone of our ethos. We understand that our clients' investments are more than just financial. We take great pride in realizing a shared vision and measure our success by the satisfaction of our clients.

02

DECODE AT A  
GLANCE



## COMPANY VALUES

Decode doesn't just build, we deliver our clients' vision. With a dynamic and diverse team based in Sydney, we're driven by innovation, commitment, and a mission to deliver excellence.

From commercial high-rises to educational institutions, we operate across the entire spectrum of the construction sector.

Our core values underpin everything we do. By living our values every day, our team is empowered to deliver optimal outcomes to our clients.

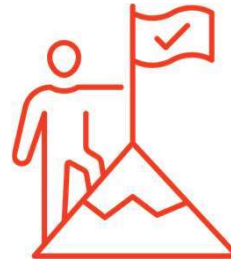
## Creating Shared Visions

SHARED VISIONS



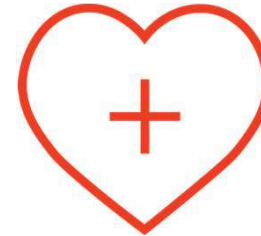
### Lift as One

Through our unique collaborative approach to construction, we align and unite under one vision and work hand in hand with our clients and partners to deliver excellence.



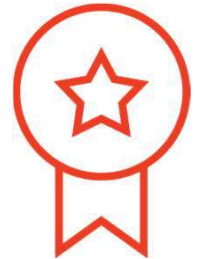
### Go the Extra Mile

At Decode, we take pride in always going the extra mile in pursuit of quality, embrace of innovation and delivering on our client's vision.



### Commit to Care

We're committed to the safety of our people, the safety and wellbeing of our clients, partners and teams.



### Deliver Excellence

We promise, we deliver. Delivering excellence lies at the core of our mission and we are committed to delivering nothing less than excellence in every project we build.

# OUR OPERATIONS AND STRUCTURE

Our business is focused on projects located in the Greater Sydney area and have expanded into the Newcastle region. DC and DG own and control eight wholly-owned subsidiary Australian entities, which also form part of the Decode corporate group.

The Decode corporate group employed approximately 150 employees in FY24, all of whom are based in Australia.

We engage a broad range of trade-contractors and suppliers totalling approximately 770 in FY24.

Products used in our construction projects are sourced from a variety of suppliers, all who operate in Australia. These products include reinforcing steel, concrete, windows, plumbing, tiles, appliances and flooring.





# OUR SUPPLY CHAIN



Decode had over 770 direct existing subcontractors/suppliers engaged for construction projects during the reporting period.

Our supply chain includes all relevant products used in construction work, as well as the use of labour, hired either directly through a labour hire firm, or indirectly contracted through trade contractors.

While our suppliers are predominantly based in Australia, it may not represent the country of origin of materials or products supplied across our construction projects.



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OUR STANCE  
AGAINST  
MODERN  
SLAVERY

# OUR APPROACH TO MODERN SLAVERY



## OUR APPROACH TO MODERN SLAVERY

Decode firmly believes in the protection of human rights, including the absolute rights to freedom from slavery and forced labour, and freedom from inhuman or degrading treatment or punishment. With respect to our direct operations, we have considered and believe that our current practices assist in reducing the risk of Modern Slavery developing or occurring.

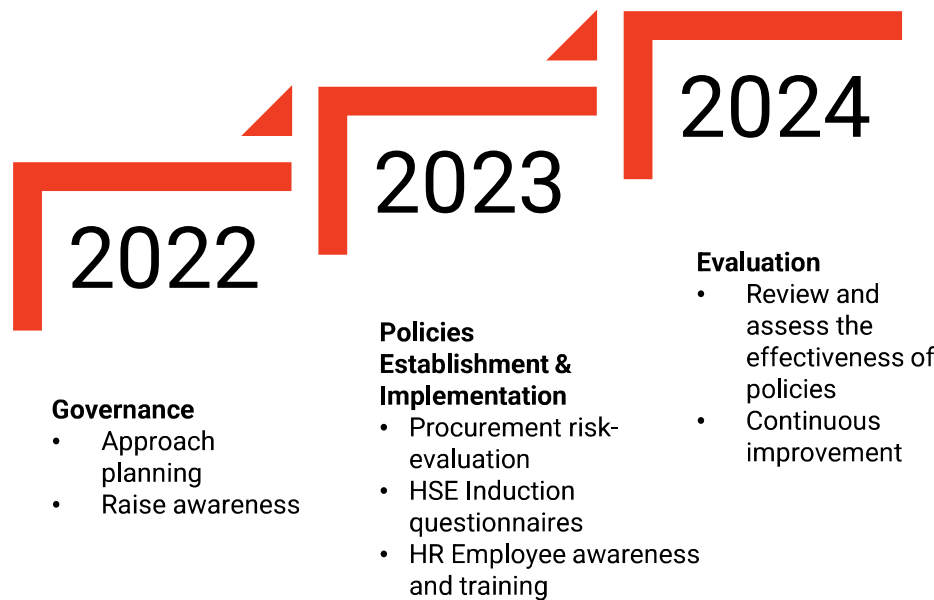
We are committed to continuing to develop and strengthen best practices that address Modern Slavery risks. Decode is committed to limiting the risk of Modern Slavery within the business supply chain and we are committed to provide ongoing efforts to comply with Australian and International slavery legislation.

We have a dedicated human resources function, the responsibility of which is to seek compliance with applicable regulatory terms and conditions of employment.

We are committed to the implementation of effective systems and processes to continue to raise the awareness of Modern Slavery risks within our business operations and continue to work and collaborate with suppliers and subcontractors to mitigate risks where possible.



# OUR PROGRESS & COMMITMENT



04

RISK  
ASSESSMENT &  
MITIGATION  
APPROACH





# RISK ASSESSMENT

In this reporting period , we have focused on policy implementation consistent with our Modern Slavery Statement published in FY23.

We have undertaken assessments of Modern Slavery risks in our operations and supply chains. Within the scope of our operation, product and supply chains risks remained consistent with our existing discovery process.

Due to the nature of our industry, in spite of our efforts in improving the awareness through our employees, suppliers and trade contractors we engage with, we could still be indirectly exposed to the risk of Modern Slavery.

We use several processes to assess the potential risk of Modern Slavery in operations, including site induction checks, employee training and prequalification questionnaires for suppliers and subcontractors.

Risk areas	Key risks
Construction activity	On-site activity relevant to labourers' rights within suppliers & subcontractors
Construction material, equipment	Labour rights, safety and working environment, health and extending to governance overseas supply chain.



# ACTIONS TAKEN FOR THE REPORTING PERIOD

Goals	FY23 commitment
Documentation	<p>Review our subcontract agreements and Insert a 'Modern Slavery clause' to ensure a legal requirement to report Modern Slavery incidents.</p> <p>Update internal project delivery procedures to provide that our construction supply chain must have completed a Modern Slavery questionnaire.</p>
KPI testing	Set-up and test Key Performance Indicators, for example track # of responses from suppliers, subcontractors and labour hire firms with respect to questionnaires and prequalification checks.
Awareness	Raise awareness of Modern Slavery laws and risks through pre-qualification checks and site induction checks. Review effectiveness of questionnaires and compliance to our policy and procedures.
Reporting	Review incident reporting effectiveness to ensure any risks identified have followed the prescribed reporting process.
Training	100% completion rate for employee training on the Modern Slavery policy; including any new staff employed by the business

## ✓ ACTIONS TAKEN FOR THE REPORTING PERIOD

Goals	FY24
Documentation	<p>✓ Implemented.</p> <p>✓ Implemented. We have incorporated a Modern Slavery Act questionnaire within our Pre-Qualification process for suppliers and subcontractors. Approximately 50 new subcontractors/supplier pre-qualification questionnaires were engaged in the reporting period.</p>
KPI testing	<p>✓ Implemented. Since its implementation, we have received responses from eight subcontractors, representing 16% responsive rate returned. Of these, only one subcontractor indicated "N/A," while the remaining respondents provided affirmative responses.</p>
Awareness	<p>✓ Implemented. 1. We have incorporated questionnaires within safety system Hammertech as part of induction . 2. Additional Online employee training of MS policy was performed.</p>
Reporting	✓ Implemented.
Training	<p>✓ Implemented. MS policy published &amp; updated Employee handbook.</p>



# MITIGATION APPROACH

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## FY25 Goals

Documentation	Annual review of Modern Slavery documentation implemented to ensure alignment of our objectives and effectiveness of the measures we have implemented. Subsequently, we will provide further recommendations to “enhance” the awareness of Modern Slavery as part of subcontractor/ supplier engagement.
KPI testing	Effectiveness of our measures <ul style="list-style-type: none"><li>• Track and improve Supplier/Subcontractor questionnaires responsive rate analysis</li><li>• Track and measure site induction check-ins, to ensure all stakeholders attending our project sites are made aware of our Modern Slavery policy</li></ul>
Awareness & Training	Collaboration <ul style="list-style-type: none"><li>• Engaging with staff, suppliers and subcontractors within our business to identify any stakeholders that may require training and support.</li><li>• Provide training to new employees coming into Decode and any staff members that marked NO in acknowledgement of MS policy</li></ul>
Reporting	New MS committee establishment: <ul style="list-style-type: none"><li>• Quarterly meeting with head of procurement, HSE, HR to review compliance , review annual objectives.</li><li>• Follow up of action items and recommendations applicable.</li></ul>

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ASSESSING  
EFFECTIVENESS

# ASSESSING EFFECTIVENESS & REVIEWING OUR SYSTEM

In FY24, we have focused on the implementation of the Modern Slavery policy and engaged our Commercial and HSE departments to assess and address identified Modern Slavery risks in our industry.

We are satisfied that going forward we will be better positioned to more effectively assess and educate suppliers and subcontractors in our construction supply chain.

## MS committee objectives

- We have conducted a review of the effectiveness of Modern Slavery policy to satisfy ourselves that overall awareness has increased, and that our MS measures have been effective.
- Reviewing the reporting and disclosure process to ensure Decode are following the prescribed process for capturing, reporting and disclosing identified MS risks as per our Modern Slavery policy.
- Review the effectiveness of the Pre-qualification and site induction questionnaires, to ensure they are being implemented consistently.
- Ensure all employees have read and acknowledged our MS Policy . Currently 90% of employees have read the policy. We expect this KPI to be 100% (subject to new employment start timing allow them to review the handbook where may not reach 100% completion at any time)





# ASSESSING EFFECTIVENESS & GOALS

Over this reporting period, we assessed the effectiveness of our actions across four key performance areas:

1. Governance & due diligence;
2. Procurement & supply chain;
3. HR practices, training & education;
4. Grievances and reporting.

With respect to each of these focus areas, we have taken proactive steps and will continue to develop measures and collect statistic data to assess the effectiveness of our actions in the next reporting period.

These include:

- Analyse the number of suppliers completing our Modern Slavery questionnaire;
- Increasing completion rates for modern slavery awareness training;
- The number of Modern Slavery cases identified and remediated. (if any)

Over subsequent reporting periods, the MS Committee will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with our approach to continuous improvement and compliance as a business.



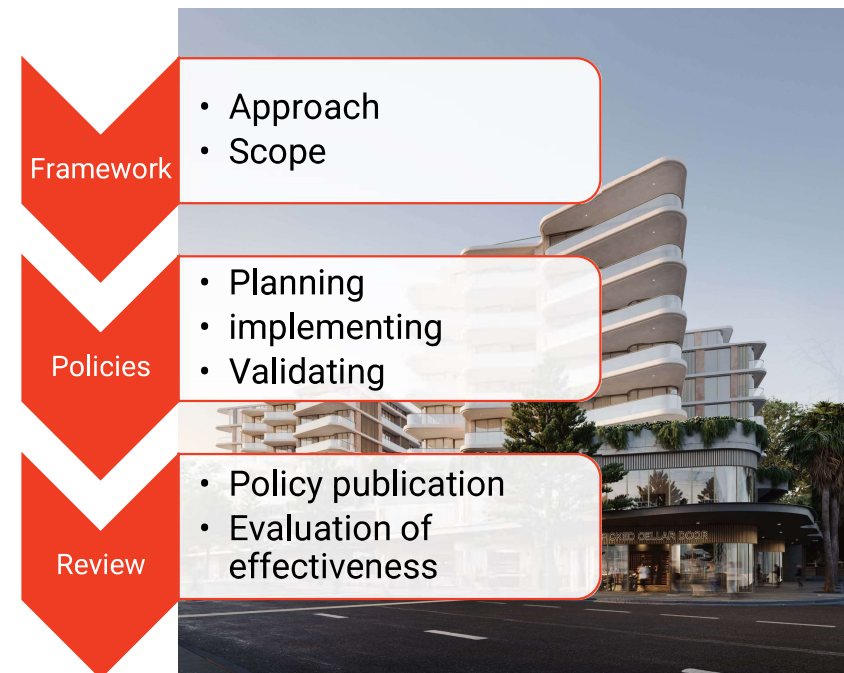
06

CONSULTATION  
PROCESS WITH  
ENTITIES OWNED  
OR CONTROLLED  
BY DECODE

# CONSULTATION PROCESS

DC and DG own or control eight wholly-owned subsidiary Australian entities, which also form part of the Decode corporate group.

- During the current reporting period, we have involved relevant stakeholders in our review and the establishment of this statement.
- Modern Slavery training was conducted, and the Modern Slavery Policy and incident form was provided to all staff from all the entities controlled by Decode.
- With new MS committee's involvement, we will ensure further engagement of the Modern Slavery Act 2018's reporting requirements with subsidiaries in the next reporting period. Such as information regarding the actions we intend to take to address these requirements and establishment of material during the process.
- The responsibility of the Modern Slavery objectives will rest with the MS committee who will engage, set expectations and ensure accountability of our KPI's across all entities of the group.



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APPROVAL

# APPROVAL

This statement was approved by Hussein El Rihani, sole director of Decode Corp Pty Ltd (ACN 629 285 534) and Decode Group Pty Limited (ACN 611 188 339), on 20/12/2024.



Hussein El Rihani  
Director of  
Decode Corp Pty Ltd  
Decode Group Pty Ltd





